

THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
WELTON DOUGLAS	§	CASE NO. 19-41285-R
XXX-XX-3540	§	
2513 HADDOCK DRIVE	§	CHAPTER 13
PLANO, TX 75025	§	
	§	
ROSALIND DOUGLAS	§	
XXX-XX-2472	§	
	§	
DEBTORS	§	

TRUSTEE'S OMNIBUS OBJECTION TO CLAIMS

TO THE HONORABLE JUDGE OF THIS COURT:

Carey D. Ebert, in her capacity as the Chapter 13 Trustee in the above-referenced case (the "Trustee"), files this Omnibus Objection to Claims pursuant to Fed. R. Bankr. P. 3007(d) and LBR 3007.

30-DAY NEGATIVE NOTICE - LBR 3007(b) [omnibus]:

ATTENTION: IF YOU ARE ONE OF THE CLAIMANTS LISTED IN THE CHART BELOW, YOUR CLAIM MAY BE REDUCED, MODIFIED, OR ELIMINATED.

Accordingly, you should carefully examine this pleading to determine whether the allowance of your proof of claim is being challenged. If your claim is listed, you should discuss this pleading with your attorney, if you have one in this bankruptcy case. If you do not wish for the Court to eliminate or change your claim, you must file a written response opposing the treatment proposed for your particular claim in this omnibus objection, explaining the factual and/or legal basis for that response.

Each of the challenged claims listed in the chart below stands as an independent claim objection. No hearing will be conducted on any listed objection unless a written response to a particular objection is filed with the Clerk of the United States Bankruptcy Court and served upon the Chapter 13 Trustee WITHIN THIRTY (30) DAYS FROM DATE OF SERVICE listed in the certificate of service unless the Court shortens or extends the time for filing such response. If no response in opposition is timely served and filed by any listed claimant, this pleading shall be deemed to be unopposed with regard to that particular claim, and the Court may enter an order sustaining the objection to that particular claim as requested in the omnibus objection.

If any listed claimant files a timely response, a hearing shall be scheduled upon at least thirty (30) days' notice to consider the claim objection as to that particular claim. If you file a response but fail to appear at the scheduled hearing, your response in opposition may be stricken. The Court reserves the right to set a hearing on any matter.

Claimant	Claim #	Grounds for Claim Objection	Proposed Treatment
HOME POINT FINANCIAL CORPORATION 11511 LUNA ROAD, SUITE 300 FARMERS BRANCH, TX 75234	22	<input type="checkbox"/> duplicate claim; <input checked="" type="checkbox"/> claim not timely filed; <input type="checkbox"/> claim filed in the wrong case; <input type="checkbox"/> claim satisfied during the case; <input type="checkbox"/> claim not entitled to priority or exceeds priority statutory amount; <input type="checkbox"/> other:	LATE FILED CLAIM NOT ALLOWED; TRUSTEE OBJECTS

WHEREFORE, Carey D. Ebert, Chapter 13 Trustee, respectfully prays for the entry of an order sustaining her objection to the foregoing proofs of claim and for such other and further relief to which she may be entitled.

Respectfully submitted,

/s/ H. Jefferson LeForce
Carey D. Ebert, Chapter 13 Trustee, TBN 05332500
H. Jefferson LeForce, TBN 00791094
Office of the Standing Chapter 13 Trustee
500 North Central Expressway, Suite 350
Plano, Texas 75074
(972) 943-2580 / Fax (972) 943-8050

DECLARATION OF CAREY D. EBERT

The basis for the objection(s) stated above are true and correct to the best of my knowledge based upon my office's review of the claim(s).

I declare under penalty of perjury that the foregoing to be true and correct.

Dated: January 17, 2020

/s/ Carey D. Ebert

Standing Chapter 13 Trustee

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Trustee's Omnibus Objection to Claims has been served upon the following parties in interest on the date set forth below by mailing a copy of same to them via first class mail.

COLLINS & ARNOVE
555 REPUBLIC DR.
SUITE 200
PLANO, TX 75074-5469

D. ANTHONY SOTTILE, ESQ
AUTHORIZED AGENT FOR HOME POINT FINANCIAL CORP
394 WARDS CORNER RD, SUITE 180
LOVELAND, OH 45140

VALERIE SMITH PRA RECEIVABLES MANAGEMENT, LLC
PO BOX 41021
NORFOLK, VA 23541

WELTON DOUGLAS
ROSALIND DOUGLAS
2513 HADDOCK DRIVE
PLANO, TX 75025

HOME POINT FINANCIAL CORPORATION
11511 LUNA ROAD, SUITE 300
FARMERS BRANCH, TX 75234

Dated: January 17, 2020

/s/ H. Jefferson LeForce

Office of the Standing Chapter 13 Trustee